

**AMADOR COUNTY AIR POLLUTION CONTROL DISTRICT
TITLE V OPERATING PERMIT**

ISSUED TO: Wheelabrator Martell Inc.

Facility Location: 11901 Ampine-Fibreform Road, Sutter Creek, California

Application Received: May, 1996, including supplement of June 21, 1996 and correspondence of October 19, 1998

Nature of Business: Wood waste fired cogeneration power plant

Primary SIC: 4911

Responsible Official: William Carlson, V.P. and General Manager Alternate Energy Group

Facility Contact Person: Mike Burt, Plant Manager
Bret Meyer, Operations Manager/EH&S Director

Permit Number: Amador Title V - 02

Permit Issuance Date: May 2, 2001

Permit Expiration Date: May 2, 2006

Date of Most Recent Revision: N/A

Approved For Issuance By:

/s/
Karen Huss, Air Pollution Control Officer
Amador County Air Pollution Control District

May 2, 2001
Date

I. FACILITY DESCRIPTION

This permit pertains to the operations of Wheelabrator Martell Inc. located at 11901 Ampine-Fibreform Road, Sutter Creek, California. The facility burns wood related materials including lumber processing byproducts, wood chips, tree trimmings, clean construction wood trimmings, paper cubes and agricultural materials (biomass) in a Zurn boiler to generate both steam and electric power. All of the fuels are delivered to the facility by truck. The facility stores raw materials that have been chipped or milled in various stockpiles prior to being conveyed to the boiler for combustion. Other process support equipment located at the Wheelabrator facility includes various material receiving, mixing and conveying systems.

Both a multiclone system and an electrostatic precipitator are used to collect particulate matter emitted from the combustion process. NO_x emissions from the boiler are controlled through the use of good combustion practices. When good combustion practices alone are not sufficient to meet NO_x limitations, the use of urea injection may be used.

The facility is considered a federal major source of air pollutants due to its potential to emit greater than 100 tons per year of particulate matter, nitrogen oxides, and carbon monoxide.

II. EQUIPMENT LIST

- A. Fuel Staging and Blending System including storage piles and receiving hoppers.
- B. Truck and Trailer Unloading Systems including one fixed and one portable truck dump platforms.
- C. Hogged Fuel Preparation System including receiving hoppers, drag chain conveyor, disc scalper, knife hog and belt conveyors.
- D. Fuel Supply and Return Conveyor System including belt feeders, belt conveyors, emergency divert chute and belt tripper.
- E. ZURN Cogeneration Boiler with multiclone and electrostatic precipitator

III. APPLICABLE REQUIREMENTS – EMISSIONS AND OPERATIONAL LIMITATIONS

The following emission limitations and conditions of operation are adapted from District Rules approved in the SIP, the facility's EPA PSD Permit No. NSR 4-4-8 SJ 83-04, NSPS 40 CFR 60, Subpart Db and District operating permits for the facility.

A. PARTICULATE MATTER EMISSIONS FROM FACILITY EQUIPMENT OTHER THAN THE ZURN BOILER:

Processing equipment at the facility shall not discharge particulate matter at a rate greater than 24.7 pounds/hour. This rate is based on a system wide throughput of 22.5 tons per hour. (*Rules 211 and 212*)

B. FUGITIVE DUST: The facility shall take all reasonable efforts to control fugitive emissions. Fugitive emissions include all emissions that become airborne from equipment and systems associated with this permit to operate, except those which are emitted from an exhaust stack. (*Rule 218*) ***This condition is a District only rule (not in the SIP) and not federally enforceable.***

C. ZURN BOILER:

The Zurn Boiler shall not emit pollutants exceeding any of the following quantities or concentrations (*USEPA PSD permit No. NSR 4-4-8 SJ 83-04, 40 CFR 60, Subpart Db, ACAPCD Permit to Operate WHE07 and Rules as indicated*). When more than one requirement exists for a pollutant, the most stringent of the requirements must be met.

1. Sulfur Oxides:

- 200 pounds per hour expressed as SO₂. (*SIP Rule 19*)
- Sulfur compounds, calculated as sulfur dioxide, in excess of 2000 ppm by volume (0.2%) of exhaust gas. (*Rule 210*)

2. Nitrogen Oxides:

- 50.8 pounds per hour Nitrogen Oxides expressed as NO₂ and averaged over each 24 hour period beginning at midnight. (*PSD permit*)
- 222.5 tons per year. (*District permit*)
- 100 ppm dry volume corrected to 12% CO₂ and averaged over each 24 hour period beginning at midnight. (*PSD permit*)
- 140 pounds per hour of nitrogen oxides, calculated as nitrogen dioxide (NO₂). (*SIP Rule 19*)

3. Particulate Matter:

- 7.3 pounds per hour averaged over any two hour period. (*PSD permit*)
- 31.9 tons per year. (*District permit*)
- 0.012 grains per dry standard cubic feet corrected to 12% CO₂ over any two hour period. (*PSD permit*)
- 0.10 pounds per million Btu heat input. (*Subpart Db*)
- No wood fired boiler may discharge combustion contaminant particulate in excess of 0.2 grains per dry standard cubic foot. (*Rule 210*).
- The discharge into the atmosphere from fuel burning equipment shall not exceed 10 pounds per hour combustion contaminants (particulate) and derived from the fuel. This includes filter catch and condensable particulate. (*SIP Rule 19, Rule 216*)
- No owner or operator of a facility shall cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity during all periods except startup, shutdown, or malfunction. (*Subpart Db*)
- No facility shall discharge any air contaminant into the atmosphere that is greater than 20 percent opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period. (*Rule 202*).

4. Total Hydrocarbons (THC or VOC):

- 35.0 lbs per hour averaged over any two hour period. (*PSD permit*)
- 153.3 tons per year. (*District permit*)
- 175 ppm dry volume corrected to 12% CO₂ and averaged over any three hour period. (*PSD permit*)

5. Carbon Monoxide:

- 930 lbs per hour averaged over any three hour period. (*PSD permit*)
- 590 lbs per hour averaged over any eight hour period. (*PSD permit*)
- 2,584.2 tons per year. (*District permit*)
- 3500 ppm dry volume corrected to 12% CO₂ and averaged over any three hour period. (*PSD permit*)
- 2200 ppm dry volume corrected to 12% CO₂ and averaged over any eight hour period. (*PSD permit*)

D. STEAM PRODUCTION: Steam production shall not exceed 205,000 pounds per hour averaged over any three hour period. (*District permit*)

E. ZURN BOILER FUEL SPECIFICATIONS: The facility shall burn only natural biomass fuels, such as wood, wood waste, agricultural plants or tree material, sawdust containing minor amounts of diesel oil, hydraulic oils and grease, and paper cubes. The wood waste materials may originate from such activities as on-site and off site urban wood waste recycling. Any wood waste that has been chemically treated shall not exceed 10% by weight of the total fuel charge to the boiler at any one time. Paper cube fuel shall be limited to 25% of the total fuel input (dry weight). The maximum quantity of paper cube fuel to be burned shall not exceed 45,000 tons per year. Any oil contaminated sawdust burned must have

originated on site from minor spill cleanups only and may not exceed 5% by weight of the total fuel charge. The total amount of oily sawdust burned in one day shall not exceed 1000 pounds. Records shall be maintained to verify dates and quantities of the materials burned.

IV. MONITORING AND TESTING (Rule 500 VI.B.5)

A. PARTICULATE FROM NON-POINT SOURCES

For sections III.A. and B. the facility will perform the following monitoring and testing activities:

1. The facility will conduct semi-annual testing of non-point sources in accordance with EPA Method 22. If fugitive emissions are not measured using this method, then no further testing will be required. If emissions are observed, the facility will perform an evaluation using an EPA Method 9 certified reader within 24 hours of the Method 22 evaluation to determine compliance.

B. PARTICULATE FROM THE ZURN BOILER

For sections III.C.3. the facility shall perform the following monitoring activities:

1. Measure and record opacity from the stack by the use of a continuous emission monitor (CEM). The monitor shall be calibrated as recommended by the manufacturer and maintained in good operating condition. Hourly averages shall be recorded and kept on file for review by ACAPCD staff. Records of hourly average emissions concentrations may be kept either by means of paper charts or electronic data on disk and be kept for at least 2 years after the data was collected. Additionally, the facility will verify compliance with this requirement by performing regular maintenance on the systems combined with regular visual evaluations of opacity. The facility will conduct one opacity observation by an EPA Reference Method 9 certified VE reader at least once during each calendar month while the boiler is in operation. *(40 CFR 60, Subpart Db, sections 60.46b, 60.48b, 60.49b, PSD permit, Rule 513)*

2. The facility shall not operate the boiler apart from the electrostatic precipitator. Spacing tolerances within the electrostatic precipitator shall be maintained as dictated by the performance guarantee of the vendor. The facility shall prepare a maintenance plan for the operation of the electrostatic precipitator. The operator shall schedule regular inspections for such problems as air leaks and precipitator plate damage. The plan shall list repair procedures to be followed if emissions are observed. A copy of the plan shall be provided to the District. A maintenance log shall also be maintained showing when maintenance was performed. *(Rule 505)*

C. NITROGEN OXIDES FROM THE ZURN BOILER

For Section III.C.2. the facility shall perform the following monitoring activities:

1. The facility shall use urea injection as necessary to control and reduce NOx emissions from the Zurn Boiler stack to below 100 ppm. The amount of urea to be injected may be variable as needed to meet the emissions standard, but shall not exceed 20 gallons per hour of 23% nitrogen equivalent solution, as provided by the facility in the authority to construct application for the urea injection system, to minimize ammonia slip. The facility shall monitor the NOx emissions through the use of a continuous emissions monitor and adjust the operating parameters of the control system to maintain NOx concentrations below 100 ppm.

2. Emissions of nitrogen oxides from the Zurn boiler stack shall be measured and recorded by use of a continuous emissions monitor (CEM). The monitor shall be calibrated as recommended by the manufacturer and maintained in good operating condition. Hourly averages shall be recorded and kept on file for review by ACAPCD staff. Records of hourly average emissions concentrations may be kept either by means of paper charts or electronic data on disk and be kept for at least 2 years after the data was collected. *(PSD permit, Rule 513)*

D. CARBON MONOXIDE FROM THE ZURN BOILER

For Section III.C.5. the facility shall perform the following monitoring activities:

1. Emissions of carbon monoxide from the Zurn boiler stack shall be measured and recorded by use of a continuous emissions monitor (CEM). The monitor shall be calibrated as recommended by the manufacturer and maintained in good operating condition. Hourly averages shall be recorded and kept on file for review by ACAPCD staff. Records of hourly average emissions concentrations may be kept either by means of paper charts or electronic data on disk and be kept for at least 2 years after the data was collected. *(PSD permit, Rule 513)*

E. SULFUR OXIDES FROM THE ZURN BOILER

The facility is assumed to be in compliance with limitations set in Section III.C.1. for sulfur oxides based on the engineering estimates provided in the permit application and the fact that wood derived fuel does not contain high levels of sulfur. The facility is not required to test or monitor sulfur oxides.

F. HYDROCARBON FROM THE ZURN BOILER

The facility is assumed to be in compliance with limitations set in Section III.C.4. for total hydrocarbons based on historical stack testing results (32.9 pounds per hour average 1996-1999). The facility will continue to test hydrocarbon emissions annually. See G. below.

G. STACK TESTING FOR THE ZURN BOILER

The facility will conduct a stack test of the Zurn boiler system at least once per calendar year during the duration of this permit to determine the boiler system emissions. The first test shall be conducted within 180 days of the issuance of the Title V operating permit. The test shall be conducted to measure emissions for all pollutants with limitations specified in Section III.C. of this permit except sulfur oxides. The volatile organic content of the exhaust gasses from the stack shall be determined using EPA Method 25 or 25A (40 CFR 60 Appendix A) or an equivalent method approved by the Air Pollution Control Officer. The particulate matter content of the exhaust gasses from the stack shall be determined using EPA Method 5 (with the impinger train included in order to determine compliance with District rule requirements) or an equivalent method approved by the Air Pollution Control Officer. The test shall also measure carbon monoxide, nitrogen oxides and ammonia emissions. A copy of the stack test plan of procedure and a notice of the testing date shall be submitted to the Air Pollution Control District at least 30 days prior to the date the test is conducted. *(Reference Rule 500 (VI)(B)(5), Rule 216, and PSD permit).*

H. STEAM FLOW

The facility will measure steam flow using a steam flow transmitter. The transmitter shall be calibrated as recommended by the manufacturer and maintained in good operating condition. Hourly averages shall be recorded and kept on file for review by ACAPCD staff. Records of hourly average steam flow may be kept either by means of paper charts or electronic data on disk and be kept for at least 2 years after the data was collected.*(Rule 513)*

I. FUEL

The facility will take samples and inspect every load of fuel received to ensure the fuel meets the specifications in Section III.E. Oil contaminated sawdust shall be tested annually and the results submitted to the District. Maximum metals and total halogen content of the contaminated sawdust shall not exceed the following limits:

Arsenic	5 ppm
Cadmium	2 ppm
Chromium	10 ppm
Lead	100 ppm
Total Halogens	1000 ppm

Any contaminated sawdust exceeding these limits must be treated and disposed of as required by law.

V. RECORDKEEPING (Rule 500 VI.B.6, Rule 505 and Rule 513)

A. MINIMUM RECORDKEEPING REQUIREMENTS:

The facility shall keep records of the above monitoring and testing activities including: date, place and time of sampling; operating conditions at the time of sampling; date, place and method of analysis; and results of the analysis.

B. RECORD RETENTION:

The facility shall maintain records of all required monitoring data and support information for a period of at least 5 years from the date of sample collection, measurement, report, or application.

C. ADDITIONAL SPECIFIC REQUIREMENTS:

The Air Pollution Control Officer may require the facility to keep records necessary to show compliance with the conditions of this permit. The following specific records have been required:

1. The quantity and type of fuel (urban woodwaste, paper cubes and biomass) burned in the Zurn boiler and the boiler system emissions.
2. Hours of operation for the Zurn boiler.
3. The facility shall record the hours of operation of all permitted equipment.
4. The facility shall record the amount of raw materials processed by all permitted equipment.

D. FALSIFICATION:

The facility shall not knowingly falsify or render inaccurate any monitoring device or method of record required to be maintained or followed by this permit. (*Rules 513 and 515*)

VI. REPORTING AND COMPLIANCE (Rule 500 VI.B.7)

A. MINIMUM REPORTING REQUIREMENTS:

The facility will report at a minimum the following information to the District:

1. Conditions that result in any excess emissions or other violations of this permit, including those due to emergency, upset or breakdown conditions. The facility shall notify the District by telephone or facsimile within two (2) hours of the start of the event. A written report must be submitted to the Air Pollution Control Officer within one week (7 days) of the event. (*Rule 516, SIP Rule 404*).
2. A monitoring report identifying deviations from permit requirements, including those reported in VI.A.1. The monitoring report must include the probable cause of each deviation and any preventative or corrective action taken by the facility. The monitoring report must be submitted six months after the issuance of this permit, and every six months thereafter.
3. A progress report on any compliance schedule for equipment that is not in compliance with this permit as noted in VI.A.2. above. The progress report must include the date when compliance will be achieved, an explanation of why compliance was not, or will not be achieved by the scheduled date, a log of any preventative or corrective action taken, and a written statement from the responsible official of the facility which certifies the truth, accuracy and completeness of the report. The progress report must be submitted semi-annually.
4. The facility shall furnish, in a timely manner, any information or records requested by the Air Pollution Control Officer pertaining to emissions compliance, production records, equipment and facility operations, or other air quality related information. (*Rule 500 VI.B.6., Rule 513 and Rule 505*)
5. By January 31st of each year, the facility shall provide a written report to the District describing the annual material throughput, fuel usage, and hours of operation for all equipment associated with this permit for the previous calendar year. (*Rule 513*)
6. The facility shall provide to the District a copy of all reports and data submitted to the USEPA which are related to the operations of this facility. (*Rule 505*)

B. EMERGENCY PROVISIONS – In addition to the notification requirements of VI.A.1. in the case of an emergency at the facility, the responsible official shall submit to the ACAPCD a signed contemporaneous log and other evidence that demonstrates the following: an emergency occurred, the cause of the emergency, the facility was being properly operated at the time of the emergency, all steps were taken to minimize the emissions resulting from the emergency and within two (2) working days of the emergency provide the ACAPCD with a description of the emergency and corrective actions taken.
(Rule 500 VI.B.12)

C. COMPLIANCE PLAN:

Insofar as the facility is currently in compliance, the compliance plan consists of continued adherence to the requirements of this permit and those requirements set forth in applicable regulations and statutes.
(Rule 500 VI.B.8.)

D. COMPLIANCE SCHEDULE:

Insofar as the facility is in compliance at the time of the issuance of this permit, no schedule is required to attain compliance. (Rule 500 VI.B.9.)

E. COMPLIANCE CERTIFICATION:

In order to demonstrate compliance with the provisions of this permit, the facility shall submit an Annual Emissions Report and Certification Statement by the anniversary date of the permit describing the emissions of regulated pollutants for the previous calendar year. The compliance certification shall include the following as a minimum: identification of each term or condition of the permit that is the basis for the certification; the compliance status; whether compliance was continuous or intermittent; and the methods used for determining the compliance status of the source, both currently and over the entire statement reporting period. The Annual Emissions Report and Certification Statement and any additional reports or compliance certifications submitted shall be certified by a responsible official for truth, accuracy, and completeness. Submission of fraudulent data or information may be deemed a criminal violation. All documents must be submitted to both of the following:
(Rule 500 VI.B.14.)

Director, Air Division
U.S. EPA
75 Hawthorne Street, AIR-3
San Francisco, CA 94105

Air Pollution Control Officer
Amador APCD
500 Argonaut Lane
Jackson, CA 95642

VII. GENERAL CONDITIONS

A. DUTY TO COMPLY: The facility shall comply with all terms and conditions of this permit. (Rule 500 VI.B.11.)

B. LIMITATION: This permit does not release the facility from the duty to comply with any requirements of any applicable statute, ordinance, code or law, including any Federal requirements, statutes of the State of California, County of Amador, city ordinances or other legal requirements. This permit does not authorize emission of air contaminants in excess of limits established by the Code of Federal Regulations, the California Health and Safety Code or the Rules and Regulations of the ACAPCD.
(Rule 507)

C. PROPERTY RIGHTS: This permit does not convey any property rights of any sort, or any exclusive privilege. (Rule 500 VI.B.11)

D. VIOLATION: Any permit noncompliance constitutes a violation and is grounds for enforcement actions, permit termination, permit revocation, re-issuance, or modification, or for denial of a permit renewal application. Each day of non-compliance constitutes a separate violation. (Rule 500 VI.11.)

E. SEVERABILITY: The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the facility shall be construed and enforced as if the permit did not contain the particular provision held to be invalid and the applicable requirements underlying these provisions shall remain in force. (Rule 500 VI.B.13.)

F. DUTY TO PAY: Failure to pay fines, fees or other assessed charges from the District may result in enforcement action or termination of the permit or both. All fines, fees or other assessed charges are due and payable within 30 days of receipt of the invoice by the facility. (Rule 500 VII.)

G. PERMIT TRANSFER: Upon change of control or ownership, the applicant shall notify any succeeding owner or operator of this facility of the existence of this permit in writing, a copy of the notification shall be provided to the District. The terms and conditions of this permit shall be binding on all subsequent owners or operators. A request for an administrative amendment shall be sought for changes in ownership or address of the facility. (Rule 500 and Rule 517)

H. PERMIT REOPENING: This permit may be terminated, suspended, reopened, or amended for cause. Any request from the facility for revisions to the permit, planned non-compliance or other planned changes shall not stay the conditions of the permit. This permit must be reopened and revised if any of the following occur: additional requirements become applicable to the equipment subject to this permit and three or more years remain before the permit expires; additional requirements become applicable to an affected source under the acid rain program; the Air Pollution Control Officer or the EPA Administrator determines that the permit contains a material mistake, inaccurate statements were made in establishing the emission standards, other terms or conditions of the permit, or the permit must be revised or revoked to ensure compliance with the applicable requirements or ACAPCD regulations; or the EPA Administrator finds that cause exists pursuant to Rule 500 V.H., or in response to a public petition. (Rule 500 VI.B.11.)

I. PERMIT OR EQUIPMENT MODIFICATIONS: This permit may be modified to reflect changes in operation, procedure, ownership or other provisions as necessary by following procedures specified in ACAPCD Rule 500. Any modification other than normal repair and maintenance, or a change that is not allowed under the operation of this permit or Rule 500 V.I., shall require a revised or new permit. If a new or revised permit is required, the operator shall make application to the Air Pollution Control Officer and follow the procedures as specified in ACAPCD Rule 500 IV.

J. POSTING OF PERMIT: This permit shall be posted on or near the equipment listed above. This permit shall be readily available for inspection at all times while the equipment is operating. The permit (or a copy) shall be prominently displayed in a location accessible to all persons operating this equipment system (Rule 508).

K. RIGHT TO ENTER: Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the facility shall allow the District, the U.S. EPA and the ARB, or authorized representatives to perform the following: enter upon the premises where an actual or potential source is located or where any records are kept as required to demonstrate compliance with the terms and conditions of this permit and to have access to and copy, at reasonable times, these records; inspect at any time while the plant is open for business or in production any facilities, equipment (including monitoring and control equipment), practices or operations regulated or required under this permit; and sample or monitor any substances or parameters at any location and obtain and remove samples of any discharge or emission of pollutants, The facility may conduct parallel sampling for verification purposes. (Rule 500 VI.B.10. and Rule 509)

L. EMISSIONS TRADING: No permit revision shall be required for increases in emissions allowed under any approved economic incentives, marketable permits, emissions trading, or other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. The facility has requested and has been granted the right for trading emissions increases and decreases within the facility to the extent the applicable requirements provide for such trading and have been approved as tradable by the Air Pollution Control Officer. (Reference 40 CFR 70.6 (a)(8)).

M. DEFENSES TO ENFORCEMENT ACTIONS:

1. Need to Halt Activity - It shall not be a defense for a facility in an enforcement action that it would have been necessary to halt or reduce activity to maintain compliance. (Rule 500 VI.B.11)

2. Emergency Upset, Breakdown or Scheduled Maintenance - An emergency upset or breakdown condition shall be an affirmative defense to an enforcement action only if the conditions set forth in ACAPCD Rule 516 are met.

N. CONFIDENTIAL RECORDS: Any request for confidential designation of records must be made in writing to the Air Pollution Control Officer as specified in Rule 514.

O. TERMS: Terms not otherwise defined in the permit shall have the meanings assigned to such terms in the referenced regulations. (Reference 40 CFR 70.2).

P. ASBESTOS REMOVAL: The facility shall comply with the provisions of 40 CFR Part 61, subpart M (Asbestos) during any renovation or demolition activity at this facility. (Reference 40 CFR 70.6 (a)(1)(i) and 40 CFR Part 61, subpart M (Asbestos)).

Q. STRATOSPHERIC OZONE: The facility shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, subpart F Recycling and Emissions Reduction. (Reference 40 CFR 70.6 (a)(1)(i) and 40 CFR Part 82, subpart F).

R. RISK MANAGEMENT PLAN: Should the facility become subject to 40 CFR Part 68, the facility shall comply with the standards within the required timeframe in the regulations and subsequently certify compliance with Part 68 as part of the annual compliance certification required in VI.E. of this permit.

S. ACID RAIN PROVISIONS: This facility is not subject to Title IV, Acid Rain Provisions – 40 CFR 72, section 72.6 (b)(4)(i).

T. NESHAPS: Should the facility become subject to an existing or newly promulgated National Emission Standards for Hazardous Air Pollutants for Source Categories, the facility shall comply with the standards within the required timeframe in the regulations. (40 CFR 63)

U. SECTION 502 (b)(110) CHANGES: The facility shall monitor for and record, any section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term. Notice must be given to the Air Pollution Control District for any such change seven days in advance of enactment. (Reference 40 CFR 70.4 (12), Clean Air Act Section 502(b)(10)).

V. PERMIT TERM: This permit shall be valid for a period of five (5) years from the date the permit is approved for issuance. The right to operate terminates on the permit expiration date. If a written application for renewal of the permit is submitted at least six (6) months (but not more than 12 months) prior to expiration, the facility may continue to operate equipment in accordance with the conditions of this Title V permit until final action is taken by the District on the renewal application. (Rule 500 VI.B.15.)